

EXHIBIT 18

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION
No. 1:17 cv 00129; 1:17 cv 00256

RICHARD L. CAMPBELL,
Plaintiff,

vs.

SHIRLEY TETER and SINCLAIR
COMMUNICATIONS, LLC,
Defendants.

SHIRLEY TETER,
Plaintiff,

vs.

PROJECT VERITAS ACTION FUND,
PROJECT VERITAS, and JAMES
E. O'KEEFE, III,
Defendants.

Videotaped Deposition of CHRISTIAN LEE
HARTSOCK, at 12400 Wilshire Boulevard, Suite 700,
Los Angeles, California, beginning at 10:28 a.m.,
and ending at 5:27 p.m. on Thursday, November 15,
2018, before MICHELE URBINA, Certified Shorthand
Reporter No. 9635.

1 **A Wearing a button-down -- button-up.**

2 Q No tie?

3 **A No tie.**

4 Q Is that a white shirt?

5 **A Yes.**

6 Q Where was that videotaped?

7 **A Madison.**

8 Q Madison, Wisconsin?

9 **A Yes.**

10 Q When was that?

11 **A The 15th of September.**

12 Q 2016?

13 **A Yes.**

14 (Video playing.)

15 BY MR. SASSER:

16 Q Who was present in that snippet we just saw
17 with him in the white shirt?

18 **A Myself, Scott Foval, and Brittany Rivera.**

19 Q The video that we just saw, was that video
20 that you videotaped?

21 **A Yes.**

22 Q Was Ms. Rivera also videotaping?

23 **A Yes.**

24 Q Now, who is she?

25 **A She, at the time, was a journalist for**

1 (Video playing.)

2 BY MR. SASSER:

3 Q So there's a considerable back-and-forth
4 there with Mr. Foval about this North Carolina
5 woman?

6 A Yes.

7 Q And Mr. Foval says that they didn't know who
8 she was beforehand?

9 A Yes. Before -- that's -- those are the
10 words that Scott Foval said.

11 Q Did he mention the name Shirley Teter?

12 A In that clip he did not.

13 Q Are you aware of any clip where Scott Foval
14 mentions Shirley Teter?

15 A Not off the top of my head.

16 Q After you do one of these videotapes, do you
17 transcribe it immediately?

18 A I transcribe it very shortly thereafter.

19 Q What about this one, what date do you think
20 this was?

21 MR. DEAN: Object to form.

22 THE WITNESS: What -- would you repeat your
23 question?

24 BY MR. SASSER:

25 Q When was this video made?

1 **A Not off the top of my head.**

2 Q Do you remember him mentioning the word
3 Asheville?

4 **A Not off the top of my head.**

5 MR. SASSER: This is probably a good time to
6 take a break.

7 THE VIDEOGRAPHER: We're off the record.
8 The time is 12:58.

9 (Luncheon recess taken from 12:58 p.m. to
10 1:37 p.m.)

11 THE VIDEOGRAPHER: We are back on the
12 record.

13 The time is 1:37.

14 Please, proceed.

15 BY MR. SASSER:

16 Q Have you thought of the name of that bar?

17 **A I think same -- 520 -- same as last time.**

18 Q Could it be Garfield?

19 **A Garfield's, yes, that's it.**

20 Q And which part of the video was made there?
21 Is that one made in April of 2016?

22 **A Yes.**

23 Q And that's where Mr. Foval was wearing the
24 red and white shirt, the silver tie, and the dark
25 jacket?

1 very top PV Video Summary Form. I assume that's why
2 that's there.

3 Q Who gave you this template?

4 A Well, Project Veritas.

5 Q What does Sal do for Project Veritas?

6 A Sal? He does tech stuff.

7 Q Does he also do security?

8 A Not that I know of.

9 Q Okay. This says, "PV Video Summary Form."
10 Journalist name, you got yours and Brittany Rivera's.
11 Date video was obtained, date of upload.

12 What's the difference between obtained and
13 uploaded?

14 A Video obtained, means we obtained the video,
15 we recorded the video.

16 Upload is when we upload the videotape to
17 the server, the -- whatever program we are using to
18 submit videotapes.

19 Q The company repository for videos?

20 A Yes.

21 Q It says, "Target name," location, contact
22 info, Scott Foval, advisor to Democrat -- Democracy
23 Partners advisor to Americans United for Change, and
24 then you have his phone number and e-mail address?

25 A Yes.

1 Q Script operation, reengaging Foval on server
2 voting and Trump rally birddogging.

3 What does "script" mean?

4 A That is the questions that we intend to ask.
5 The subjects.

6 Q Did you have a list of questions to ask
7 Mr. Foval?

8 A Yes.

9 Q Did you ask those questions?

10 A Yes.

11 Q Where would I find that script?

12 A I don't know that you would. It was --
13 could have just been in my head.

14 I mean, I knew going in the things that I
15 wanted to ask him about. I don't believe I -- I
16 don't -- I don't know that I wrote them down in any
17 other form than what's already been -- what's in the
18 exhibit.

19 Q If you look at the lower right-hand corner,
20 there are numbers which appear to be numbers you put
21 on it, and then there is the PVDEF numbers, which are
22 like -- are called Bates number.

23 Do you see those?

24 A Yes -- do you mean the underlying number?

25 Q Yes, the subscripts on the lower right-hand

1 corner.

2 Do you see that?

3 **A Yes.**

4 Q Okay. If you would turn to page 8, your
5 page 8, which is PVDEF 5232.

6 Do you see that?

7 **A Yes.**

8 Q And does this appear to be a transcription
9 of the tape that -- or the video that we just heard
10 that you made?

11 **A Yes.**

12 Q You've got written here, "Britt. So let me
13 ask you in the meantime, this North Carolina woman,
14 does that mean she's going out again, she's going to
15 go out again?"

16 And Foval says, "I have no idea. We didn't
17 know who she was ahead of time. We just had somebody
18 who connected with her before that rally. And we knew
19 that she was putting herself out there to draw a fire.
20 That's all we knew."

21 And then you say, "So someone that you guys
22 work with contacted her?"

23 And Foval says, "That's what we know about
24 it now."

25 And you say, "Put out a secret casting

1 is it?

2 A The name Shirley Teter is not in that
3 portion.

4 Q You are welcome to look through the entire
5 document, if you would like.

6 A I mean, you're asking me if it is in the
7 entire document, is that why I'm looking?

8 Q Yes.

9 A I don't -- let's see.

10 Oh. I don't see Shirley Teter's name.

11 Q Do you see anything that Mr. Foval said
12 about Asheville?

13 A I did not see the word "Asheville."

14 Q Did you see anything about elderly?

15 A Yes.

16 Q Where is that?

17 A That is at least in Brittany's -- in
18 Brittany's transcript, "I know why the party doesn't
19 want to tread ball with them. They are afraid. They
20 are afraid of reinforcing this bad behavior. The
21 reality is, though" -- oh, page 3 -- "we can" -- PVDEF
22 0005227.

23 "The reality is, though, we can pay a group
24 of senior citizens, a group of immigrants, a group of
25 students," ellipsis.

1 Is that it?

2 A Let me see.

3 That's all I have seen in this document.

4 Q Do you see any reference to "oxygen tank"?

5 A I did not.

6 Q See any reference to "Asheville"?

7 A I did not. I did not see -- not by name,
8 no.

9 Q Where is that?

10 A I said, no, I did not see a reference to
11 Asheville by name.

12 Q Okay. You see on page 5249, "Foval nods and
13 says he's responsible for the North Carolina rally
14 incident"?

15 A Yes.

16 Q And you think that's about Shirley Teter?

17 A Yes. I know it was.

18 Q You know that?

19 A Yes.

20 Q How do you know that?

21 A Because that's what -- that is one of the
22 main questions I wanted to ask, is if he was
23 responsible for the incident in North Carolina, which
24 was --

25 Q Did you ask that?

1 Q Did you videotape him?

2 A Yes.

3 Q Did that make it into the Rigging the
4 Election, Part 1, tape?

5 A I don't recall where -- or whether it was in
6 Part 1.

7 Q It may have been in a later one?

8 A Yeah.

9 Q Okay. Did you also call Scott Foval from
10 New York?

11 A Yes.

12 Q Why were you doing that?

13 A There was a number of reasons. Well,
14 actually, there was at least -- well, there was a
15 number of calls, but not that many.

16 I know one of them was in the -- was in the
17 office during the summer.

18 And that was in relation to the meetings
19 that we were setting -- that we were brokering between
20 our -- Mr. Roth and Mr. Creamer.

21 And then there was another telephone call
22 late in -- very late in the investigation that I had
23 with Scott Foval, in order to follow up on -- on
24 remarks he made on September the 15th.

25 In the moment -- the part where I invoke

1 something to -- as if I'm showing that I don't really
2 care what Brittany's asking, when she's clearly asking
3 about Shirley Teter.

4 So that's what I was referring to in this
5 letter.

6 Q She didn't mention Shirley Teter; did she?

7 A She did, but not by name.

8 Q Right.

9 You have no idea who Scott Foval is talking
10 about?

11 A I do. Absolutely.

12 MR. SASSER: Okay. Let me show you another
13 videotape.

14 (Video playing.)

15 BY MR. SASSER:

16 Q Do you remember an October 17, 2016,
17 conversation with Scott Foval?

18 A Yes.

19 (Video playing.)

20 BY MR. SASSER:

21 Q And is that where you are trying to follow
22 up on things from September 15?

23 A Yes.

24 Q Did you try to get him to say certain words
25 during that call?

1 Q Where is Shirley's name there?

2 A Her name is not here. But he was referring
3 to her.

4 Q How do you know he was referring to her?

5 A Because that is what we were talking about.
6 There was no other possible thing of it. But --

7 Q You didn't mention her name; right?

8 A Not according to this transcript.

9 Q And Brittany didn't mention her name?

10 A I did not know -- I don't believe I knew --
11 I knew of the story. I did not know her name by heart
12 at the time. So I would be surprised if I did say her
13 name. It was very clear what we were talking about,
14 though.

15 She was -- it was unmistakable.

16 "She was trained. We trained a whole group
17 of people in North Carolina, South Carolina,
18 New Hampshire, New York, Virginia, here, Iowa, to go
19 and assert themselves to get hit or miss kind of
20 thing. He of course meant that figuratively, I said
21 literally hit or miss" --

22 THE REPORTER: Slow down, please.

23 THE WITNESS: That was -- I was obviously
24 referring to the hit that she took, the alleged
25 cold-cock.

1 did you?

2 A I absolutely read about -- every single
3 quote that I verbalized was regarding violence.

4 Q You did not mention the word "violence"?

5 A I did not claim to have noticed the term
6 "violence," the actual term "violence," but we were
7 very clearly referring to violence.

8 MR. SASSER: We need to stop to change the
9 videotape.

10 THE VIDEOGRAPHER: This is the end of Media
11 Number 2.

12 We're going off the record.

13 The time is 2:57.

14 (Recess taken.)

15 THE VIDEOGRAPHER: We're back on the record.

16 This is the beginning of Media Number 3 in
17 the deposition of Christian Hartsock.

18 The time is 3:04.

19 Please, proceed.

20 BY MR. SASSER:

21 Q Mr. Hartsock, I want to show you a video, a
22 phone call that you were apparently involved in.

23 Can you tell me who the person is there at
24 14:58?

25 A James O'Keefe.

1 MR. SASSER: Okay. I'm going to go ahead
2 and start playing.

3 (Video playing.)

4 BY MR. SASSER:

5 Q That's you talking; right?

6 A Yes.

7 Q And was that Scott Foval on the phone?

8 A Yes.

9 (Video playing.)

10 BY MR. SASSER:

11 Q Okay. Who is that?

12 A That is Brittany Rivera.

13 I'm going to turn it up a couple notches.

14 (Video playing.)

15 BY MR. SASSER:

16 Q Okay. What does the screen in front of her
17 say?

18 A "Tell me about the violence."

19 Q Who put that on the screen?

20 A James.

21 (Video playing.)

22 BY MR. SASSER:

23 Q Do you know why Ms. Rivera left?

24 A No.

25 (Video playing.)

1 BY MR. SASSER:

2 Q Who is the lady in Raleigh?

3 A Shirley Teter.

4 Q Really?

5 A That's who I was referring to.

6 Q All right.

7 MR. DEAN: Hold on.

8 Were you finished with your answer?

9 THE WITNESS: Yeah, Brittany Rivera had
10 lived in Raleigh. And I was -- I believe I was
11 thinking North Carolina, I was thinking Brittany, I
12 was thinking Raleigh.

13 So it is, actually, I'm able to trace why I
14 mistakenly said Raleigh, but I meant North Carolina.

15 BY MR. SASSER:

16 Q Did you mean Asheville?

17 A I was referring to the incident in
18 Asheville.

19 MR. SASSER: Okay.

20 (Video playing.)

21 BY MR. SASSER:

22 Q Are you sure you weren't talking about a
23 Latina from Raleigh?

24 A Yes.

25 Q That's what you were saying in the next

1 sentence?

2 **A Play it back.**

3 **Q Sure.**

4 (Video playing.)

5 **THE WITNESS: So the word, "but," I was**
6 **referring to Cesar Vargas wanting specifically to**
7 **enlist Latinos to do the birddogging.**

8 **And I said there have -- and I followed that**
9 **with, there have been African-Americans, and the woman**
10 **in Raleigh, and -- but he wanted to make it about**
11 **Latinos.**

12 (Video playing.)

13 BY MR. SASSER:

14 **Q That's you in the corner?**

15 **A Yes.**

16 **Q Shorter hair then?**

17 **A Yes.**

18 (Video playing.)

19 BY MR. SASSER:

20 **Q What's Mr. O'Keefe doing?**

21 **A He is trying to get me to -- he's**
22 **instructing me on how to direct my line of**
23 **questions.**

24 **Q He keeps pointing at the computer that says,**
25 **"Tell me about the violence"?**

1 **A Yes.**

2 (Video playing.)

3 BY MR. SASSER:

4 Q What's Mr. O'Keefe doing now?

5 **A He's pointing to the computer screen where**
6 **he had written, "Tell me more about the violence."**

7 (Video playing.)

8 BY MR. SASSER:

9 Q Who is the African-American kid?

10 **A So that would be another birddogger, another**
11 **agitator that Scott Foval had been responsible for**
12 **organizing, who got punched at a Trump rally.**

13 And/or was -- it could have also been the
14 one that -- the agitator that Scott Foval referred to
15 at Garfield's 502, when he talks about the walker
16 protest. Where, quote, "roughed up," where a black
17 guy had gotten roughed up, and he said that was us.

18 So he could have been referring either to
19 that, the Wisconsin, or another -- another
20 birddogger.

21 (Video playing.)

22 BY MR. SASSER:

23 Q What is O'Keefe doing at 17:49?

24 **A He's emphatically pointing at his computer**
25 **screen where he's written, "Tell me more about the**

1 **violence."**

2 (Video playing.)

3 BY MR. SASSER:

4 Q Now, what's he doing at 18?

5 A He's making hand gestures to -- emphatic
6 hand gestures referring to the "Tell me about the
7 violence" message he has on the computer screen.

8 Q How far away from you was he?

9 A Couple feet.

10 Q Was that distracting?

11 A Pardon me?

12 Q Was that distracting, when you are talking
13 to talk to Mr. Foval?

14 A Yeah. I found -- I mean, I believe I found
15 it distracting at the time.

16 Q Were you annoyed?

17 A Yeah.

18 Q Is Mr. O'Keefe an easy guy to work for?

19 A It is a challenging job by the nature of
20 the -- by the very nature -- the very nature, it is a
21 challenging job.

22 I have positive feelings about James. And
23 by necessity it is -- it has its challenges.

24 And was he challenging to work for? We have
25 had our ups and downs, such as in any business --

1 **long-term business relationship.**

2 (Video playing.)

3 BY MR. SASSER:

4 Q What's he doing at 18:06 now?

5 A **He's referring to the word "violence."**

6 Q He's actually tapping the computer screen?

7 A **Yes.**

8 Q And is he looking at you?

9 A **Yes.**

10 Q What kind of look is that on his face?

11 A **Pleading. I mean, he is -- he is asking --**
12 **you know, he wants me -- he's -- he's asking me -- you**
13 **know, what's your question?**

14 Q Is he frustrated with you?

15 A **He's frustrated.**

16 (Video playing.)

17 BY MR. SASSER:

18 Q So you finally got the word "violence" out.

19 Is Mr. O'Keefe satisfied now?

20 MR. DEAN: Object to form. Misstates the
21 video.

22 BY MR. SASSER:

23 Q Can you answer that?

24 A **I can't answer for James and what he's**
25 **feeling.**

1 "Teter"; right?

2 **A No.**

3 Q And then says here, "The dialogue continues.

4 "PV1. So someone that you guys work with
5 contracted her.

6 "Foval. That's what we know about it now.

7 "PV1. Put out a secret casting notice. I
8 don't know how the hell you guys do this.

9 "Foval. No, no, no, no. It was not
10 pre-planned, but she was one of our activists."

11 That's also consistent with your AAR;
12 right?

13 **A Yes.**

14 MR. SASSER: Let's mark this as the next
15 exhibit.

16 (Plaintiff's Exhibit 9 was marked for
17 identification by the court reporter.)

18 BY MR. SASSER:

19 Q Mr. Hartsock, you are looking at Exhibit 9,
20 which is an e-mail from Joe Halderman to Christian
21 Hartsock, 10/14, 6:38 p.m.; is that correct?

22 **A Yes.**

23 Q It is entitled, "Rigging the Election,
24 Inciting Violence, Part 1, Draft 3."

25 What is that?

1 **A This is a draft. This is a transcription of**
2 **the rough-cut of the videotape.**

3 Q And it's three pages long -- I'm sorry.

4 It is 7- -- PVDEF 7106.

5 MR. DEAN: Thank you.

6 BY MR. SASSER:

7 Q Did you see any mention of Shirley Teter in
8 this Draft 3?

9 **A Not individually.**

10 Q There's no reference to the entire incident;
11 is there?

12 **A The entire incident in Asheville?**

13 Q Yeah.

14 **A Not individually.**

15 Q Had you had any input into the drafting of
16 Rigging the Election, Part 1, prior to October the
17 14th?

18 **A Did I have any --**

19 Q Input.

20 **A Input? Yes.**

21 Q Who was the primary drafter?

22 **A Joe Halderman.**

23 Q Joe Halderman.

24 What's his position?

25 **A He's a producer.**

1 **A Yes.**

2 MR. SASSER: Okay. Let's mark as the next
3 exhibit, PVDEF 845.

4 (Plandtiff's Exhibit 10 was marked for
5 identification by the court reporter.)

6 BY MR. SASSER:

7 Q That's Exhibit 10 that you are looking at
8 now?

9 **A Yes.**

10 Q And it is an e-mail from you to Joe
11 Halderman of October 14 at 6:48 p.m.?

12 **A Yes.**

13 Q Do you know whether that's Pacific Time or
14 Eastern Time?

15 **A I do not.**

16 Q Okay. You're responding to the previous
17 e-mail, where Mr. Halderman has sent to you the drafts
18 of Rigging the Election, Inciting Violence, Part 1,
19 Draft 3?

20 **A Yes.**

21 Q You say, "My notes in read," r-e-a-d?

22 **A I know how to spell "red." I must have been**
23 **very tired that day.**

24 Q Okay.

25 **A Or in a hurry.**

1 Q And, unfortunately, I don't have a color
2 copy of it, but I think I can read what is your
3 suggestions.

4 You say, "I wouldn't say rigging the
5 election."

6 Is that you?

7 A Yes.

8 Q "That promises something we don't have.
9 That will deflate what we do have."

10 You ended up losing that ballot; didn't
11 you?

12 A Yes.

13 Q Do you still think you're right?

14 A I haven't given the matter much thought
15 since.

16 Q Okay. Two-thirds of the way down the page
17 there's, "Bumper VO Number 1."

18 And is that your language there about adding
19 montage?

20 A Yes.

21 Q "Add montage of news coverage of victims of
22 violent Trump supporters."

23 Is that your only suggestions on the first
24 page?

25 Which isn't fair to you, because it is not

1 A I don't recall when. I believe I sent him
2 the After Action Report especially regarding --
3 especially after the 15th, because by that time I had
4 already been in contact with him, and he had already
5 been an unofficial advisor on the investigation.

6 Q An unofficial advisor?

7 A Yeah, he was advising on the investigation.
8 He was telling me what he knew about Bob Creamer, and
9 the Chicago antics as Scott refers to them.

10 Q And you were telling him about what you were
11 finding in the investigation?

12 A Yeah. I was briefing him on what we were
13 finding. And I certainly briefed him that we had
14 confirmed that Scott Foval at least claimed to have
15 been behind the Shirley Teter incident that he had
16 brought my attention to.

17 Q Did you have any qualms about whether, if he
18 was talking about Shirley Teter, he was
19 exaggerating?

20 A Can you restate the question?

21 Q Did you have any qualms about when Mr. Foval
22 was, indeed, talking about Shirley Teter, he was
23 exaggerating his involvement?

24 A Did you have any qualms, is your question.
25 I'm sure I had qualms about everything he

1 said. We were reporting what he -- what we were
2 learning from him.

3 What he was telling -- we were reporting
4 what he was telling us.

5 Q Were you concerned -- did you ever think
6 about asking Ms. Teter whether he was talking about
7 her?

8 A Not that I recall.

9 Q Why not?

10 A The -- we were reporting what Scott Foval
11 was telling us, and -- about what -- I didn't imagine
12 that one of the birddoggers would want to admit to
13 what he was already admitting -- we did not have a
14 relationship with Shirley Teter. I had a relationship
15 with Scott Foval. We had a relationship with Bob
16 Creamer.

17 Q But a journalist would actually ask the
18 person whether what they were writing about him was
19 true or not and give them an opportunity to comment;
20 wouldn't they?

21 MR. DEAN: Object to the form.

22 THE WITNESS: I don't -- I don't -- I don't
23 exactly know how to -- what is your question?

24 BY MR. SASSER:

25 Q But a journalist would have an obligation to

1 Is that what New York Times wrote?

2 **A Yes.**

3 Q How successful was the Rigging the Election
4 video?

5 **A Very.**

6 Q Was it the most successful project Veritas
7 ever had?

8 **A Yes.**

9 Q How many views did it pick up on YouTube?

10 **A I think last I checked, 7. -- or at least**
11 **Part 1 was 7.6 million.**

12 I recall it getting millions of views per
13 day in the first -- in the first week. I think
14 4 million in the first day, as I recall. I --

15 Q Did --

16 **A -- don't know exactly. It was the number**
17 **one trending political video on YouTube.**

18 Q Was it the most watched --

19 **A For several --**

20 Q -- of any kind on YouTube for about
21 24 hours?

22 **A I don't know.**

23 Q It came just before the third debate, the
24 third presidential debate; right?

25 **A Yes.**

1 Q And it got mentioned by Donald Trump in the
2 debate?

3 A It did.

4 Q And Mr. O'Keefe was in the spin room taking
5 credit for it; right?

6 A I don't know. I -- I don't know exactly
7 where he was. He was in Las Vegas.

8 Q Which is where the debates were?

9 A Yes.

10 Q The number of views that Veritas got was 10,
11 20 times more than it ever got, any other video they
12 have ever had before?

13 A I don't know the precise numbers, but I --
14 that sounds about right.

15 Q If Mr. O'Keefe is telling people that it got
16 22 million views, you have no reason to argue with
17 that; right?

18 A I -- I don't know the exact numbers.

19 Q Okay.

20 A It got many millions of views.

21 Q Leading up to that, Mr. O'Keefe was offering
22 bonuses to people if certain things occurred; right?

23 MR. DEAN: Object to the form.

24 THE WITNESS: Bonuses were offered and
25 given.

1 identification by the court reporter.)

2 BY MR. SASSER:

3 Q It is an e-mail from you to Mr. Pollak as of
4 August 11th, 2016?

5 A Uh-huh.

6 Q And you're sending him an uncut video and
7 transcript from your conversation with Scott Foval?

8 A Yes.

9 Q What conversation was that?

10 A Wait. Say this again?

11 Q What conversation with Scott Foval were you
12 sending him?

13 A The conversation at Garfield's 502.

14 Q That would have been back in April?

15 A Yes.

16 Q This is just another example of you keeping
17 him up to speed?

18 A Yes.

19 MR. SASSER: Let's mark this as the next
20 exhibit.

21 THE REPORTER: Number 18.

22 (Plaintiff's Exhibit 18 was marked for
23 identification by the court reporter.)

24 MR. DEAN: Can you give me the number again?
25 I'm sorry.